

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**STIPULATION FURTHER EXTENDING THE TOLLING  
OF THE STATUTE OF LIMITATIONS**

IT IS HEREBY STIPULATED AND AGREED, by and between Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff (“Madoff” and, together with BLMIS, the “Debtors”) on the one hand, and Citco Global Custody NV and Citco Bank Netherland NV Dublin (the “Citco Companies”), on the other hand, in each case by and through their respective attorneys, as follows:

1. On December 8, 2010, the United States Bankruptcy Court for the Southern District of New York entered a Stipulation and Order Tolling the Statue of Limitations by and between the Debtors and the Citco Companies (the “Stipulation”), ECF No. 3314.

2. Paragraph 15 of the Stipulation provided the parties could further extend the tolling period by consensual stipulation without further or additional approval of the Court.

3. On June 8, 2011, the parties further extended the tolling period through and including December 9, 2011.

4. On November 15, 2011, the parties further extended the tolling period through and including June 6, 2012.

5. On June 5, 2012, the parties further extended the tolling period through and including November 30, 2012.

6. On November 26, 2012, the parties further extended the tolling period through and including May 30, 2013.

7. On May 3, 2013, the parties further extended the tolling period through and including November 30, 2013.

8. On November 6, 2013, the parties further extended the tolling period through and including May 30, 2014.

9. On May 6, 2014, the parties further extended the tolling period through and including November 30, 2014.

10. On November 20, 2014, the parties further extended the tolling period through and including May 30, 2015.

11. On May 28, 2015, the parties further extended the tolling period to November 26, 2015.

12. On November 17, 2015, the parties further extended the tolling period to May 24, 2016.

13. On May 12, 2016, the parties further extended the tolling period to August 22, 2016.

14. On August 12, 2016, the parties further extended the tolling period to October 21, 2016.

15. On October 20, 2016, the parties further extended the tolling period to January 19, 2017.

16. On January 18, 2017, the parties further extended the tolling period to July 18, 2017.

17. On July 6, 2017, the parties further extended the tolling period to January 12, 2018.

18. On December 18, 2017, the parties further extended the tolling period to July 11, 2018.

19. On June 27, 2018, the parties further extended the tolling period to January 7, 2019.

20. The Debtors and the Citco Companies hereby stipulate and agree by and through their respective attorneys to further extend the tolling period provided in Paragraph 9 of the Stipulation for an additional period of approximately 180 days, through and including July 5, 2019.

21. The Debtors and the Citco Companies further stipulate and agree by and through their respective attorneys that all other provisions contained in the Stipulation shall remain in full force and effect as part of this stipulation.

22. This stipulation constitutes the complete expression of the agreement of the parties hereto concerning the subjects covered herein, and no modification of, or amendment to, this stipulation shall be valid unless in writing and signed by the parties.

23. This stipulation shall be governed by and construed in accordance with the laws of

the State of New York.

24. This stipulation may be executed in any number of counterparts and by the parties hereto in separate counterparts, each of which when so executed shall be deemed to be an original and all of which taken together shall constitute one and the same document.

25. The parties irrevocably consent to the exclusive jurisdiction of the Bankruptcy Court with respect to any dispute concerning this stipulation.

Dated: January 2, 2019  
New York, New York

Respectfully submitted,

/s/ Gregory Laufer

Paul, Weiss, Rifkind, Wharton & Garrison LLP  
1285 Avenue of the Americas  
New York, NY 10019-6064  
Telephone: (212) 373-3543  
Facsimile: (212) 492-0543  
Andrew Gordon  
Email: agordon@paulweiss.com  
Gregory Laufer  
glaufer@paulweiss.com

*Attorneys for Citco Global Custody NV and  
Citco Bank Netherland NV Dublin*

/s/ Thomas L. Long

Baker & Hostetler LLP  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Thomas L. Long  
Email: tlong@bakerlaw.com

*Attorneys for Irving H. Picard, Esq. Trustee  
for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and the estate of Bernard L.  
Madoff*